

**EXHIBIT A IS BEING FILED UNDER SEAL PURSUANT
TO THE PROTECTIVE ORDER ENTERED IN THIS
CASE ON AUGUST 20, 2004 BECAUSE IT CONTAINS
CONFIDENTIAL INFORMATION**

Exhibit B

quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010 | TEL 212-849-7000 FAX 212-849-7100

SENDER'S PHONE NUMBER:

212-849-7187

SENDER'S EMAIL ADDRESS:

elizabethalbes@quinnemanuel.com

Mary Vigue
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, NW
Washington, D.C. 20004-2415

Re: Leighton Tech v. Oberthur Card Systems, Inc.

Dear Mary,

Enclosed please find a hard copy set of documents OCS_Z_099602 - OCS_Z_100602, sent as a supplement to Oberthur's recent production. Please let me know if I can be of further assistance.

Best regards,



Elizabeth Albes
Paralegal

quinn emanuel urquhart oliver & hedges, llp

LOS ANGELES | 865 South Figueroa Street, 10th Floor, Los Angeles, California 90017 | TEL 213-443-3000 FAX 213-443-3100

SAN FRANCISCO | 50 California Street, 22nd Floor, San Francisco, California 94111 | TEL 415-875-6600 FAX 415-875-6700

SILICON VALLEY | 555 Twin Dolphin Drive, Suite 560, Redwood Shores, California 94065 | TEL 650-801-5000 FAX 650-801-5100

Exhibit C

James David Jacobs (JJ-7351)
 Frank M. Gasparo (FG-2958)
 Susan R. Knox (SK-4110)
 BAKER & McKENZIE LLP
 805 Third Avenue
 New York, New York 10022
 Tel. (212) 751-5700
 Fax (212) 759-9133

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES LLC,

Plaintiff and Counterclaim Defendant,

v.

OBERTHUR CARD SYSTEMS, S.A.,

Defendant and Counterclaim Plaintiff.

)
) 04 Civ. 02496 (CM) (LMS)
)
) DEFENDANT OBERTHUR
) CARD SYSTEMS, S.A.'S
) SUPPLEMENTAL RESPONSES
) TO PLAINTIFF LEIGHTON'S
) SECOND SET OF
) INTERROGATORIES (NOS. 1-9)
)
)

Pursuant to the Federal Rules of Civil Procedure and the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, defendant and counterclaim plaintiff Oberthur Card Systems, S.A. ("Oberthur") hereby supplements Defendant Oberthur Card Systems, S.A.'s Responses to Plaintiff Leighton's Second Set of Interrogatories (Nos. 1-9), served on June 6, 2005, as follows:

GENERAL OBJECTIONS

Oberthur states the following objections to Plaintiff's Interrogatories:

1. Oberthur objected to the Interrogatories to the extent that they define "Smart Card" to include "contact" cards even though contact cards are not at issue in this litigation. A contact card is a card that does not contain an electronic element between the plastic core sheets during the lamination process, but contains an electronic element that is inserted after lamination is completed. Documents concerning only contact cards are

products, and the reasons why Oberthur so alleges, and identify each person with information relating to such contentions and all facts and documents concerning such contentions.

RESPONSE TO INTERROGATORY NO. 10:

Oberthur objects to this Interrogatory on the grounds that it violates Local Civil Rule 33.3 and thus requires no further response or objection. Without waiving the foregoing objection Oberthur also objects to this Interrogatory as phrased for the reasons stated in the chart preceding these Responses.

INTERROGATORY NO. 11:

If you contend that any of Oberthur's patents fail to comply with the conditions and requirements for patentability specified in Title 35 of the United States Code, including, but not limited to 35 U.S.C. §§ 102, 103 and/or 112, identify all facts supporting and/or relating to this contention, including identification of all documents and individuals supporting such contention, and further applying each limitation of each claim in Oberthur's patents to any alleged invalidating prior art patent, publication, document, machine or method.

RESPONSE TO INTERROGATORY NO. 11:

Oberthur objects to this Interrogatory on the grounds that it violates Local Civil Rule 33.3 and thus requires no further response or objection. Without waiving the foregoing objection Oberthur also objects to this Interrogatory as phrased for the reasons stated in the chart preceding these Responses.

INTERROGATORY NO. 12:

Identify all prior art, prior uses or sales, prior knowledge and/or prior inventions that Oberthur contends affects the validity of Leighton's patents, and state with specificity how each such piece of prior art, prior use or sale, prior knowledge and/or prior invention meets the requirements of 35 U.S.C. § 102 and which claims and claim

Without waiving the foregoing objection Oberthur has not completed its investigation of the facts underlying this action, or its discovery, or its trial preparation, and, as a result, may discover additional information in the course of that investigation, discovery, and trial preparation.

As soon as Oberthur has identified witnesses that it intends to call at trial, it will supplement its response to this Interrogatory.

Dated: New York, New York
July 22, 2005

BAKER & MCKENZIE LLP

By: 

James David Jacobs (JJ-7351)

Frank M. Gasparo (FG-2958)

Susan R. Knox (SK-4110)

805 Third Avenue

New York, New York 10022

Tel. (212) 751-5700

Fax (212) 759-9133

Attorneys for Oberthur Card
Systems, S.A.

**EXHIBIT D IS BEING FILED UNDER SEAL PURSUANT
TO THE PROTECTIVE ORDER ENTERED IN THIS
CASE ON AUGUST 20, 2004 BECAUSE IT CONTAINS
CONFIDENTIAL INFORMATION**

**EXHIBIT E IS BEING FILED UNDER SEAL PURSUANT
TO THE PROTECTIVE ORDER ENTERED IN THIS
CASE ON AUGUST 20, 2004 BECAUSE IT CONTAINS
CONFIDENTIAL INFORMATION**

**EXHIBIT F IS BEING FILED UNDER SEAL PURSUANT
TO THE PROTECTIVE ORDER ENTERED IN THIS
CASE ON AUGUST 20, 2004 BECAUSE IT CONTAINS
CONFIDENTIAL INFORMATION**

**EXHIBIT G IS BEING FILED UNDER SEAL PURSUANT
TO THE PROTECTIVE ORDER ENTERED IN THIS
CASE ON AUGUST 20, 2004 BECAUSE IT CONTAINS
CONFIDENTIAL INFORMATION**

**EXHIBIT H IS BEING FILED UNDER SEAL PURSUANT
TO THE PROTECTIVE ORDER ENTERED IN THIS
CASE ON AUGUST 20, 2004 BECAUSE IT CONTAINS
CONFIDENTIAL INFORMATION**

Exhibit I

James David Jacobs (JJ-7351)
 Frank M. Gasparo (FG-2958)
 Susan R. Knox (SK-4110)
 BAKER & McKENZIE LLP
 805 Third Avenue
 New York, New York 10022
 Tel. (212) 751-5700
 Fax (212) 759-9133

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES LLC,)	
)	04 Civ. 02496 (CM) (LMS)
Plaintiff and Counterclaim Defendant,)	
)	DEFENDANT OBERTHUR
v.)	CARD SYSTEMS, S.A.'S
)	RESPONSES TO PLAINTIFF'S
OBERTHUR CARD SYSTEMS, S.A.,)	THIRD SET OF REQUESTS
)	(NOS. 13-73) FOR PRODUCTION
Defendant and Counterclaim Plaintiff.)	OF DOCUMENTS AND THINGS
)	

Pursuant to the Federal Rules of Civil Procedure and the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, defendant and counterclaim plaintiff Oberthur Card Systems, S.A. ("Oberthur") hereby responds to Plaintiff's Third Set of Requests (Nos. 13-73) for Production of Documents and Things ("Requests"), dated and transmitted by facsimile by Leighton Technologies LLC ("Leighton") on April 28, 2005, as follows:

GENERAL OBJECTIONS

Oberthur states the following objections to Leighton's Requests:

1. Oberthur objects to the Requests to the extent that they define "Smart Card" to include "contact" cards even though contact cards are not at issue in this litigation. A contact card is a card that does not contain an electronic element between the plastic core sheets during the lamination process, but contains an electronic element that is inserted after lamination is completed. Documents concerning only contact cards are not relevant

paper files responsive to this Request with respect to contactless, hybrid or dual function cards.

REQUEST NO. 43:

All agendas and minutes of meetings at Oberthur concerning the patents-in-suit.

RESPONSE TO REQUEST NO. 43:

Oberthur will produce all non-privileged documents in its possession, custody or control from personal computers and paper files that are responsive to this Request.

REQUEST NO. 44:

All documents which concern any communications between Oberthur and any other person regarding any of the patents-in-suit.

RESPONSE TO REQUEST NO. 44:

Oberthur will produce all non-privileged documents in its possession, custody or control from personal computers and paper files that are responsive to this Request.

REQUEST NO. 45:

All documents including, but not limited to, opinions and advice of counsel concerning the infringement or non-infringement, validity or invalidity, enforceability or unenforceability, or interpretation of the scope of the claims of the patents-in-suit.

RESPONSE TO REQUEST NO. 45:

Oberthur will produce all non-privileged documents in its possession, custody or control from personal computers and paper files that are responsive to this Request.

REQUEST NO. 46:

All documents including patents, publications, written descriptions or other prior art references of which you are aware that concern, disclose, describe or claim any

invention disclosed, described or claimed in the patents-in-suit, or any product embodying or using any invention disclosed, described or claimed therein.

RESPONSE TO REQUEST NO. 46:

Oberthur will produce all non-privileged documents in its possession, custody or control from personal computers and paper files that are responsive to this Request.

REQUEST NO. 47:

All documents concerning any document, reference or activity alleged by anyone to be prior art to any of the patents-in-suit, or to affect the validity, enforceability or scope of any of the patents-in-suit.

RESPONSE TO REQUEST NO. 47:

Oberthur will produce all non-privileged documents in its possession, custody or control from personal computers and paper files that are responsive to this Request.

REQUEST NO. 48:

All documents concerning knowledge of use by others of any invention disclosed, described or claimed in any of the patents-in-suit.

RESPONSE TO REQUEST NO. 48:

Oberthur will produce all non-privileged documents in its possession, custody or control from personal computers and paper files that are responsive to this Request.

REQUEST NO. 49:

All documents concerning the sale or offer for sale of any product on which you rely as allegedly embodying or using any invention disclosed, described or claimed in any of the patents-in-suit, including without limitation all advertising, sales, promotional and technical materials related to such offer or sale.

RESPONSE TO REQUEST NO. 49:

Oberthur will produce all non-privileged documents in its possession, custody or control from personal computers and paper files that are responsive to this Request.

REQUEST NO. 50:

All documents concerning the public use of any product on which you rely as allegedly embodying or using any invention disclosed, described or claimed in any of the patents-in-suit.

RESPONSE TO REQUEST NO. 50:

Oberthur will produce all non-privileged documents in its possession, custody or control from personal computers and paper files that are responsive to this Request.

REQUEST NO. 51:

All documents which you contend either alone or in combination anticipate or render obvious any of the claims of the patents-in-suit.

RESPONSE TO REQUEST NO. 51:

Oberthur will produce all non-privileged documents in its possession, custody or control from personal computers and paper files that are responsive to this Request.

REQUEST NO. 52:

Documents sufficient to describe your document retention, management, and/or destruction policies, including with respect to e-mail.

RESPONSE TO REQUEST NO. 52:

Oberthur objects to this Request as phrased for the reasons stated in the chart preceding these Specific Responses.

Without waiving the foregoing objections, Oberthur will produce sufficient non-privileged documents in its possession, custody or control from personal computers and

Oberthur objects to this Request as phrased for the reasons stated in the chart preceding these Specific Responses. Accordingly, Oberthur will not produce any documents in response to this Request.

REQUEST NO. 73:

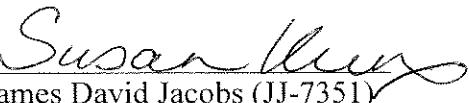
Documents sufficient to identify and describe the manufacturing process for Smart Cards provided by Oberthur to the United States Department of Defense.

RESPONSE TO REQUEST NO. 73:

Oberthur objects to this Request as phrased for the reasons stated in the chart preceding these Specific Responses. Accordingly, Oberthur will not produce any documents in response to this Request.

Dated: New York, New York
June 6, 2005

BAKER & McKENZIE LLP

By: 
James David Jacobs (JJ-7351)
Frank M. Gasparo (FG-2958)
Susan R. Knox (SK-4110)
805 Third Avenue
New York, New York 10022
Tel. (212) 751-5700
Fax (212) 759-9133
Attorneys for Oberthur Card
Systems, S.A